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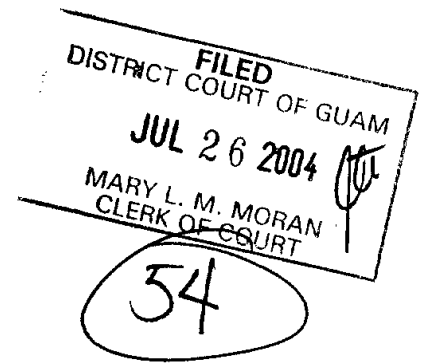
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Attorneys for Petitioners

## DISTRICT COURT OF GUAM TERRITORY OF GUAM

CIVIL CASE NO. 04-00006

JULIE BABAUTA SANTOS, *et al.*,

Petitioners,

vs.

FELIX A. CAMACHO, etc., *et al.*,

Respondents,

CHRISTINA M. S. NAPUTI,

Applicant for Intervention,

CHARMAINE R. TORRES,

Applicant for Intervention.

**PETITIONERS' MOTION FOR LEAVE  
TO FILE OPPOSITION TO  
APPLICANTS FOR INTERVENTION  
NAPUTI AND TORRES' MOTIONS TO  
INTERVENE IN EXCESS OF 20  
PAGES; with MEMORANDUM OF  
POINTS AND AUTHORITIES**

The Petitioner, Julie Babauta Santos, individually and on behalf of all those similarly situated (hereinafter EIC Class), through her attorneys of record Phillips and Bordallo, P.C., by Ricardo D. Bordallo, moves the Court pursuant to Local Rule 7.1(g) for leave to file her Opposition to Applicants for Intervention Naputi and Torres' Motions

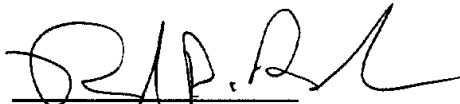
1 to Intervene in excess of twenty (20) pages. This motion is supported by the following  
 2 memorandum of points and authorities and such other evidence and arguments as the  
 3 court may permit.  
 4

5 **MEMORANDUM OF POINTS AND AUTHORITIES**

6 Applicants for Intervention Charmaine R. Torres and Christina M.S. Naputi filed  
 7 motions to intervene on June 29, 2004 and July 6, 2004, respectively. This Court  
 8 ordered the hearing on both of these motions for August 5<sup>th</sup>, 2004. Upon reviewing the  
 9 motions for intervention, counsel for Petitioner determined that Applicants for  
 10 Intervention Torres and Naputi raise similar if not identical arguments in their motions to  
 11 intervene. For the convenience of the Court and the parties, Petitioner is filing its  
 12 Opposition to both Applicants' motion in one opposing memorandum. Moreover,  
 13 considering the variety and importance of the claims raised by Applicants for  
 14 Intervention, counsel for Petitioner seeks to thoroughly discuss each issue within a  
 15 reasonable page limit not to exceed 35 pages. Based on the foregoing, Petitioner  
 16 requests leave of this Court to file its Opposition in excess of 20 pages.  
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18 Respectfully submitted this 26<sup>th</sup> day of July, 2004.

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 20 PHILLIPS & BORDALLO, P.C.  
 Attorneys for Petitioner

21  
 22 By:   
 Ricardo D. Bordallo  
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